MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
1520 E. Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901

NorthWestern Corporation
Cobb Storage Field Station 017-1 through 6
40 East Broadway
Butte, MT 59701

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		annual or semi-annual @ 1440 hrs
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Montana Air Quality Permitting	X		Permit #2783-06
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)	X		General SIP

TABLE OF CONTENTS

SECTION I. General Information

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the EPA and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original application submitted by NorthWesstern Corporation (NorthWestern), as Montana Power Company (MPC), on June 7, 1996, and the Title V permit renewal application submitted by NorthWestern on July 18, 2002.

B. Facility Location

NorthWestern owns and operates the Cobb Storage Field Station. This facility is located in the Northwest ¼ of the Northeast ¼ of Section 15, Township 35 North, Range 5 West in Glacier County, Montana. Glacier County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Cobb Storage Field Station has a total property area of 10 acres. This facility is located approximately 68 miles east of Glacier National Park, a PSD Class I Area.

C. Facility Background Information

Montana Air Quality Permit Background

On July 21, 1993, the Department of Environmental Quality (Department) issued Permit **#2783-00** to MPC for the operation of their compressor station and associated equipment located in the Northwest ¼ of the Northwest ¼ of Section 15, Township 35 North, Range 5 West in Glacier County, near Cut Bank, Montana. The station was identified as the Cobb Storage Field, Station 017-1 through 6.

On February 9, 1994, the Department issued Permit **#2783-01** to MPC. This modification revised the emission limitations from a gram per brake horsepower-hour (g/Bhp-hr) limit to a pound per hour (lb/hr) limit. In addition, to clarify NO_x mass emission calculations, NO_x emission limitations were identified as NO_2. Furthermore, a 90-day testing extension was granted to MPC. Permit #2783-01 replaced Permit #2783-00.

On September 16, 1994, the Department issued Permit **#2783-02** to MPC. This permit action increased the capacity on two of the Solar Saturn turbines (units #3 and #4) from 1100-Horsepower (Hp) to 1400-Hp and added a third 1,400-Hp Solar Saturn turbine (unit #6). In addition, the 1,100-Hp White Superior CO mass emission rates were increased to 7.28 lb/hr. The increase was necessary because the previous CO limits were based on manufacturer data under specific, ideal conditions that are not consistently present at the Cobb Storage Field. The Cobb Storage Field operations were also limited to 6,132 hours per year (hr/yr) in order to limit the facility's potential emissions below the Prevention of Significant Deterioration (PSD) thresholds. Also, the Rite Leating 0.76-MMBtu/hr boiler was replaced with a Teledyne-Laars 0.85-MMBtu/hr boiler. Permit #2783-02 replaced Permit #2783-01.

On July 24, 1997, the Department issued Permit **#2783-03** to MPC. This permit action included 40 CFR Part 60, Subpart GG as a condition of the permit because it was determined to be applicable to the facility. The modification contained exemptions from the monitoring requirements of 40 CFR Part 60, Subpart GG based on the requirement of MPC to compress and combust only pipeline quality natural gas at the Cobb Storage station. The modification also updated the rule references in the permit. Permit #2783-03 replaced Permit #2783-02.

On August 28, 1997, the Department issued Permit **#2783-04** to MPC. MPC requested that the permit be modified to correctly identify the two 240-Hp Ingersoll Rand engines as 300-Hp Ingersoll Rand engines. The original application and permit had identified the engines as 240-Hp engines. MPC discovered the mistake and requested that the permit be modified to reflect the correct engine size. Permit #2783-04 replaced Permit #2783-03.

On July 23, 2000, the Department issued Permit **#2783-05** to MPC. MPC had requested an alteration to Permit #2783-04 that included the installation of two new 1,400-Hp Solar Saturn turbine compressors. MPC requested a limitation on all of the compressors at the site to stay below the threshold that would require a PSD permit. Separate limitations were assigned to each of the three different types of compressors. Also, the Department reviewed the applicability of 40 CFR Part 60, Subpart GG and determined that Subpart GG is not applicable to this facility. As a result of the determination, the limitation of 150-ppm on the 1,400-Hp compressors and the monitoring requirements were removed from the permit. Permit #2783-05 replaced Permit #2783-04.

On November 23, 2002, the Department issued Permit **#2783-06** to NorthWestern. On July 18, 2002, the Department received a modification request from Bison Engineering, Inc. (Bison), on behalf of NorthWestern for Permit #2783-05. The permit analysis was updated to be consistent with the equipment, equipment size, and equipment descriptions for the operating permit. In addition, the two Solar Saturn turbines that were permitted in July 2000 were correctly identified as 1,450-Hp. Permit Application #2783-05 and Permit #2783-05 incorrectly identified the two Solar Saturn turbines as 1,400-Hp. In addition, on October 18, 2002, the Department received a letter dated October 15, 2002, from NorthWestern informing the Department that a name change from MPC to NorthWestern was completed. The permit was modified to reflect the name change. Permit #2783-06 replaced Permit #2783-05.

Title V Operating Permit Background

On June 7, 1996, the Department received an operating permit application for the Cobb Storage Facility. The permit application was deemed administratively complete on July 7, 1996, and the application was deemed technically complete on August 7, 1996. Permit **#OP2783-00** became final and effective on January 23, 1998.

D. Current Permit Action

On July 18, 2002, the Department received a Title V Operating Permit Renewal Application from Bison, on behalf of NorthWestern. The application was deemed administratively complete on July 18, 2002, and technically complete on September 4, 2002.

After review of the application for permit renewal and in accordance with current Department protocol for Title V operating permit requirements, the Department determined that several emitting units included in Operating Permit #OP2783-00 as significant emitting units are insignificant emitting units subject to only generally applicable requirements, as currently defined under the Title V operating permit program. Therefore, the following significant emitting units, as cited in Operating Permit #OP2783-00, have been placed on the insignificant emitting unit list for Operating Permit #OP2783-01.

- EU007 (Permit #OP2783-00) – 0.5 MMBtu/hr BS &B Reboiler;
- EU008 (Permit #OP2783-00) – 0.6 MMBtu/hr Enertek Dehy 3486 Reboiler;
- EU009 (Permit #OP2783-00) – 0.85 MMBtu/hr Teledyne-Laars Boiler;
- EU010 (Permit #OP2783-00) – < 1 MMBru/hr Building Heaters;
- EU011 (Permit #OP2783-00) – Fugitive Emissions from process valves, etc.;
- EU013 (Permit #OP2783-00) – In-plant Vehicle Traffic;
- EU014 (Permit #OP2783-00) – Emergency Backup Generator; and
- EU015 (Permit #OP2783-00) – Methanol Storage Tank

In addition, two 1,450-Hp Solar Saturn compressor turbines (EU07 and EU08) that were included in NorthWestern's Montana Air Quality Permit in July 2000, but were not incorporated into NorthWestern's Title V Operating Permit, were added to Permit #OP2783-01. Further, a 500-gallon and a 1000-gallon dehydrator condenser tanks (EU09 – Dehydrator Tanks) that were not previously identified in NorthWestern's Title V Operating Permit were added to Permit #OP2783-01. Minor editorial and equipment description corrections were also completed.

As part of the renewal application, NorthWestern also requested that portable analyzer testing included in Permit #OP2783-00 be decreased in frequency to annual testing. The Department determined that annual portable analyzer testing on compressor stations (as opposed to semi-annual) would not be accepted by EPA. Therefore, the portable analyzer testing frequency remains the same. Title V Operating Permit **#OP2783-01** replaces Title V Operating Permit #OP2783-00.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, MCA, the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on January 3, 2003.

F. Compliance Designation

The NorthWestern Cobb Field Station was last inspected on June 19, 2002. During the inspection, the facility was in compliance with both applicable air quality permits (Montana Air Quality Permit #2783 and Title V Operating Permit #OP2783). The Department reviewed records and reports for the facility since the last full compliance evaluation on May 15, 2001, and no problems or violations were found.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The complex has two primary purposes. The first is to pump the field gas up to the required pressure in the natural gas transmission system. Compression of the gas is accomplished using the compressor engines and the turbines described in Section II.B of this technical review document. Three engine heaters provide heat to the various station facilities.

The second purpose of the complex is to "dry" the gas as it is being processed. The gas contains some moisture, which must be removed from the system prior to being sent into the transmission system. This is accomplished with a dehydrator, also commonly called a reboiler or glycol unit.

Pipeline quality natural gas is injected into the Cobb Storage Field during low use periods, primarily the summer. The gas is retrieved from storage during high use periods, primarily the winter. During storage, the gas takes in some moisture and other material from the geologic formation. When the gas is retrieved, moisture and impurities are removed and the gas is brought up to pipeline pressure before being pumped into the main line for market.

In preparation for storage, natural gas is piped from NorthWestern's Main Line #1 Station to the Cobb Storage Field Station where it is sent through a "scrubber." In the scrubber, water and other liquid constituents (e.g. heavy ends, butane, C5+) drop out of the gas stream. The scrubbed gas is then injected into the formation for storage.

When consumer demand is great enough, natural gas is retrieved from storage. From the formation, the gas is routed through a scrubber to remove water and other liquid constituents that have been taken up during storage. The gas is then compressed to a pressure ranging from 550 to 650 pounds per square inch (psi) using natural gas fired engine or turbine driven compressors. The Cobb Storage Field Station uses both reciprocating internal combustion engines (RICE) and combustion turbines (CT) for compression activities.

After the gas has been compressed, it is dehydrated by a triethylene glycol (TEG) dehydrator. In the dehydrator, wet gas flows through two contactor towers where it bubbles through a "lean" TEG solution that absorbs moisture. The wet, or "rich" TEG flows from the towers to either a 0.5-million British thermal unit per hour (MMBtu/hr) reboiler or a 0.6-MMBtu/hr reboiler. Typically, the 0.5-MMBtu/hr reboiler is used as a backup to the 0.6-MMBtu/hr reboiler. Whichever reboiler is in use, the TEG is heated to approximately 300 to 350 degrees Fahrenheit (°F), driving off the water and making the glycol "lean" again.

Each reboiler is associated with a condenser/storage tank that receives vapors from the reboiler, or still vent. As these vapors leave the reboiler, they condense in the piping and tank and produce a mixture of water and natural gas liquids. This process mitigates potential atmospheric emissions.

B. Emission Units and Pollution Control Device Identification

The emission units regulated by Permit #OP2783-01 and the pollution control device utilized by each emission units are summarized in the following table:

Emissions Unit I.D.	Description	Year Installed	Pollution Control Device
EU001	300-Hp Ingesoll Rand Engine	1948	None
EU002	300-Hp Ingesoll Rand Engine	1948	None
EU003	1,400-Hp Solar Saturn Turbine	1965	None
EU004	1,400-Hp Solar Saturn Turbine	1969	None
EU005	1,100-Hp White Superior Engine	1979	None
EU006	1,400-Hp Solar Saturn Turbine	1994	None
EU007	1,450-Hp Solar Saturn Turbine	2000	None
EU008	1,450-Hp Solar Saturn Turbine	2000	None
EU009	1,000/500-gallon Dehydrator Tanks (2)	----------	None
EU010	Dehydrator Still Vent	----------	None

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any hazardous air pollutant, and is not regulated by any applicable requirement other than a generally applicable requirement. The list of insignificant emitting units at the NorthWestern facility are summarized in the following table.

Insignificant Emissions Unit I.D.	Description
IEU001	0.5 MMBtu/hr BS & B Reboiler
IEU002	0.85 MMBtu/hr Teledyne-Laars Boiler
IEU003	0.6 MMBtu/hr Enertek Dehy 3486 Reboiler
IEU004	< 1 MMBtu/hr Building Heaters
IEU005	Fugitive Emissions from Process Valves, Etc.
IEU006	In-plant Vehicle Traffic
IEU007	158-Hp Oonan Cummins Emergency Generator
IEU008	1,000-gallon Methanol Storage Tank

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Each of the five Solar Saturn turbines (three 1,400-Hp and two 1,450-Hp) is limited to 9.26 lb/hr for both NO_x and CO, and 0.86 lb/hr for VOC. The emission limits are based on Best Available Control Technology (BACT) determinations that were established by the Department. The combined total hours of operation of the five Solar Saturn turbines are limited to 24,000 hours during any rolling 12-month time period. The hours of operation limit was placed on the Solar Saturn turbines, as requested by NorthWestern, to keep the facility's potential emissions below the New Source Review (NSR) permitting threshold.

In addition, the 1,100-Hp Whte Superior compressor engine is limited to 36.46 lb/hr for NO_x, 7.28 lb/hr for CO, and 1.21 lb/hr for VOC. These emission limits are also based on BACT determinations that were established by the Department. The total hours of operation of the 1,100-Hp White Superior compressor engine are limited to 4,800 hours during any rolling 12-month time period. The hours of operation limit was placed on the White Superior compressor engine, as requested by NorthWestern, to keep the facility's potential emissions below the NSR permitting threshold.

Further, the two 300-Hp Ingersoll Rand compressor engines do not have associated emissions limits. However, the combined total hours of operation of the two Ingersoll-Rand compressor engines are limited to 9,600 hours during any rolling 12-month time period. The hours of operation limit was placed on the Ingersoll-Rand engines, as requested by NorhtWestern, to keep the facility's potential emissions below the NSR permitting threshold.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emissions units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

Montana Air Quality Permit #2783-06 requires NorthWestern to test each of the five Solar Saturn turbines (three 1,400 Hp and two 1,450-Hp) for NO_x and CO, concurrently, to demonstrate compliance with the emission limitations in the permit. The permit demands that the tests be

performed according to the EPA methods in Appendix A of 40 CFR 60. Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit can be demonstrated by burning pipeline quality natural gas on a continuous basis.

This operating permit contains requirements for semi-annual testing with a portable analyzer for each of the five Solar Saturn turbines (three 1,400 Hp and two 1,450-Hp) and the 1,100-Hp White Superior compressor engine. The permit stipulates that the portable analyzer shall be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A or shall be capable of meeting the requirements of EPA Conditional Test Method 022 for the "Determination of Nitric Oxide, Nitrogen Dioxide and NO_x from Stationary Sources by Electrochemical Analyzer." NorthWestern may use another testing procedure as approved in advance by the Department. All compliance tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). NorthWestern will then convert the NO_x and CO emissions test results from a "ppm" value to a "lb/hr" number. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to monitor compliance with the emissions limitations in the permit.

The Department will use the portable analyzer testing results as a direct measure of compliance. The operating permit may not require testing for all sources if routine monitoring is used to monitor compliance, but the Department has the authority to require testing if deemed necessary to monitor compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to monitor compliance status.

This operating permit contains requirements for performing Method 9 tests as required by the Department. Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

F. Public Notice

In accordance with ARM 17.8.132, a public notice was published in the *Pioneer Press* newspaper on or before March 19, 2003. The Department provided a 30-day public comment period on the draft operating permit from March 19, 2003, to April 18, 2003. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by April 18, 2003, will be summarized, along with the Department's responses, in the following table(s). All comments received during the public comment period will be promptly forwarded to NorthWestern so they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response

G. Draft Permit Comments (Permit #OP2783-01)

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Section III.C of the Permit (Table)	NorthWestern commented that the table contained in Section III.C of the permit stated the wrong emission limits for the 1,400-Hp and the 1,4500-Hp Solar Saturn Compressor Turbines.	The Department agreed with NorthWestern and changed the emission limits contained in the table to the appropriate emission limitations as stated in conditions III.C.4, III.C.5, and III.C.6 of the permit.
Sections III.B.7, III.C.11, III.D.11, and III.F.3 of the Permit	NorthWestern requested the Department to allow NorthWestern the ability to store the records that are required by the permit at the company headquarters in Butte, rather than on site, as the facility is an unmanned compressor station.	The Department removed the term "on site" from the recordkeeping requirements.
Section III.A of the Technical Review Document	NorthWestern commented that the hours of operation limitations for the 1,100-Hp White Superior Compressor Engine and the 300-Hp Ingersoll Rand Compressor Engines were incorrect in this section.	The Department agreed with NorthWestern and changed the hours of operation limitations to the appropriate limitations as stated in conditions III.B.4 and III.D.7 of the Permit.

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

NorthWestern requested a permit shield from all requirements that were identified as non-applicable in its permit application. Section IV of the operating permit "Non-Applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that NorthWestern identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Applicable Requirement	Reason Not Included in Permit
40 CFR 50.4 National Primary Ambient Air Quality Standards for Sulfur Oxides 40 CFR 50.5 National Secondary Ambient Air Quality Standards for Sulfur Oxides 40 CFR 50.6 National Primary and Secondary Ambient Air Quality Standards for PM_{10} 40 CFR 50.7 National Primary and Secondary Ambient Air Quality Standards for $PM_{2.5}$ 40 CFR 50.8 National Primary Ambient Air Quality Standards for Carbon Monoxide 40 CFR 50.9 and 50.10 National Primary and Secondary Ambient Air Quality Standards for Ozone 40 CFR 50.11 National Primary and Secondary Ambient Air Quality Standards for Nitrogen Dioxide 40 CFR 50.12 National Primary and Secondary Ambient Air Quality Standards for Lead 40 CFR 51.119 Intermittent Control Systems 40 CFR 31.164 Stack Height Procedures 40 CFR 51.165 Permit Requirements 40 CFR 51.166 Prevention of Significant Deterioration of Air Quality 40 CFR 51.300-307 Protection of Visibility 40 CFR 51 Appendix P 40 CFR 51 Appendix S 40 CFR 53 and 58 Appendix B 40 CFR 71 ARM 17.8.120 *et seq*. Variance Procedures	Because these rules contain requirements for regulatory authorities and not major sources, these rules can be used to impose specific requirements on a major source. Consequently, NorthWestern will not be shielded from these regulations.
40 CFR 52.21 Prevention of Significant Deterioration 40 CFR 52.24 Statutory Restriction on New Sources 40 CFR 52.29 Visibility Long-Term Strategies	Because these rules do not have specific requirements but are always relevant to a major source, these rules are never listed in the non-applicable requirements and NorthWestern will not be shielded from these regulations.
40 CFR 70	Because these rules do not have specific requirements but may be relevant to a major source, these rules are never listed in the non-applicable requirements and NorthWestern will not be shielded from these regulations.
ARM 17.8.326 Prohibited Materials for Wood or Coal Residential Stoves	Because these rules are always applicable to a major source and they may contain specific requirements for compliance, NorthWestern will not be shielded from these regulations.
ARM 17.8.330 *et seq*. Emission Standards for Existing Aluminum Plants-Definitions ARM 17.8.801 *et seq*. Prevention of Significant Deterioration of Air Quality ARM 17.8.901 *et seq*. Permit Requirements for Mafor Stationary Sources or Modifications Located Within Nonattainment areas ARM 17.8.1001 *et seq*. Montana Air Quality Permit Requirements for Major Stationary Sources or Modifications Located Within an Attainment or Unclassified Area	Because these rules consist of either a statement of purpose, applicability statement, regulatory definitions, or a statement of incorporation by reference, and due not have specific requirements associated with them, NorthWestern will not be shielded from these regulations.

ARM 17.8.514 Air Quality Open Burning Fees ARM 17.8.515 Air Quality Open Burning Fees for Conditional, Emergency, Christmas Tree, and Commercial Film Production Open Burning Permits ARM 17.8.1504 General Criteria and Evaluation Factors for Monitoring Design ARM 17.8.1505 Performance Criteria and Evaluation Factors for Monitoring Design ARM 17.8.1506 Special Criteria for Monitoring Design ARM 17.8.1507 Submittal Requirements for Monitoring Indicators and Presumptively Acceptable Monitoring ARM 17.8.1508 Additional Submittal Requirements Regarding Operating Parameter Data, Performance Testing, Implementation Plans, and Multiple Units and Control Devices ARM 17.8.1509 Deadlines for Submittal ARM 17.8.1510 Approval of Monitoring ARM 17.8.1511 Operation of Approved Monitoring ARM 17.8.1512 Quality Improvement Plan Requirements ARM 17.8.1513 Reporting and Recordkeeping Requirements ARM 17.8.1514 Savings Provisions	Because these are rules that have specific requirements that may become relevant to a major source during the permit span, NorthWestern will not be shielded from these regulations.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT/NESHAP Standards

National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH) and National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities (40 CFR Part 63, Subpart HHH) were promulgated June 17, 1999. As of the issuance date of Permit #OP2783-01, neither Subpart HH nor Subpart HHH are applicable to the facility because the facility does not meet the definition of a major source as defined in each subpart. However, the facility is potentially subject to 40 CFR Part 63, Subpart ZZZZ (Reciprocating Internal Combustion Engines) and 40 CFR Part 63, Subpart YYYY (Combustion Turbines), once the rules are promulgated.

B. NSPS Standards

As of the issuance date of Permit #OP2783-01, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility.

C. Risk Management Plan

As of the issuance date of Permit #OP2783-01, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later. However, this facility is subject to Department of Transportation (DOT) regulations for accidental release prevention; consequently, this facility is not required to submit a Risk Management Plan.